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BANK OF AMERICA CORPORATION;
BANK OF AMERICA, N.A., for itself and
as successor by merger to Countrywide
Bank, FSB; COUNTRYWIDE
FINANCIAL CORPORATION; and
COUNTRYWIDE HOME LOANS, INC.

[ADDITIONAL COUNSEL LISTED IN
SIGNATURE BLOCK]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

CITY OF LOS ANGELES, a municipal
corporation,

Plaintiff,

v.

BANK OF AMERICA
CORPORATION; BANK OF
AMERICA, N.A.; COUNTRYWIDE
FINANCIAL CORPORATION;
COUNTRYWIDE HOME LOANS; and
COUNTRYWIDE BANK, FSB,

Defendants.

Case No. 2:13-cv-09046-PA-AGR

DISCOVERY MATTER

**NOTICE OF MOTION AND
MOTION OF DEFENDANTS TO
COMPEL RULE 30(b)(6)
DEPOSITION OF PLAINTIFF CITY
OF LOS ANGELES**

Date: March 31, 2015

Time: 10:00 a.m.

Courtroom: B

Magistrate: Hon. Alicia G. Rosenberg

Judge: Hon. Percy Anderson

Complaint filed: December 6, 2013

Discovery Cutoff: September 21, 2015

Pretrial Conference: November 6, 2015

Trial Date: December 1, 2015

NOTICE OF MOTION AND MOTION

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on Tuesday, March 31, 2015 at 10:00 a.m., or as soon thereafter as counsel may be heard, in Courtroom B at the United States District Court, Central District of California, 312 North Spring Street Los Angeles, CA 90012-4701, Defendants Bank of America Corporation; Bank of America, N.A.; Countrywide Financial Corporation; and Countrywide Home Loans, Inc. (“Defendants” or “Bank of America”) will and hereby do move the Court for an Order compelling Plaintiff City of Los Angeles (“the City”) to appear for 30(b)(6) deposition.

This Motion is based upon this Notice of Motion and Motion, the concurrently filed Joint Stipulation Regarding Defendants’ Motion to Compel Rule 30(b)(6) Deposition of the City, the concurrently filed Declaration of Steven A. Ellis and its exhibits, the concurrently filed Declaration of Christopher R. Pitoun and its exhibits, and the concurrently filed [Proposed] Order, the complete court file in this action, all other matters judicially noticeable, and such further argument or evidence as may be presented to the Court, before, during, or after the hearing on the Motion.

Respectfully submitted,

Dated: March 10, 2015

By: /s/ STEVEN A. ELLIS
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COUNTRYWIDE FINANCIAL
CORPORATION; and COUNTRYWIDE
HOME LOANS, INC.

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is: 601 South Figueroa Street, 41st Floor, Los Angeles, California 90017.

On **March 10, 2015**, I served the following documents by placing a true copy thereof in a sealed envelope(s) on the persons below as follows:

**NOTICE OF MOTION AND MOTION OF DEFENDANTS TO COMPEL
RULE 30(b)(6) DEPOSITION OF PLAINTIFF CITY OF LOS ANGELES**

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. I further certify that some of the participants in the case are not registered CM/ECF users. I have served the foregoing document(s) to the following non-CM/ECF participants:

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City Attorney
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☒ By (MAIL). I placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Los Angeles, California.

☐ By (OVERNIGHT DELIVERY) I deposited in a box or other facility regularly maintained by FedEx, an express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed as stated above, with fees for overnight delivery paid or provided for.

I declare under penalty of perjury that I am employed in the office of a member of the bar of this Court at whose direction this service was made and that the foregoing is true and correct.

Executed on **March 10, 2015**, at Los Angeles, California.

Simone Robinson
(Type or print name)



(Signature)